



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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August 31, 1999

TO: File

THRU: Daron Haddock, Permit Supervisor *DRH*

FROM: Sharon Falvey, Senior Reclamation Specialist *SF*

RE: Response to Division Order 99B, Received August 20, 1999, Loadstar Energy, Inc. Horizon Mine, ACT/007/020-DO99B, Folder # 2, Carbon County, Utah

Summary:

This amendment is submitted in response to Division Order 99B (DO99B). The amendment contains extraneous information related to reclamation that requires a site specific and description of the reclamation construction sequence to obtain approval for removing the pond prior to vegetation establishment. No changes to the drainage plan were presented.

Analyses:

The following analyses is specific to the items related to hydrology as listed in DO99B ordered May 12, 1999. Items from the order are identified in bold text and followed by a discussion of related elements in the amendment.

ITEM 1a. Update the text of the operation plan of the current MRP to accurately describe the coal conveyance system, separation facilities, coal storage areas, coal mine waste handling and storage facilities area, other materials handling and storage areas, snow storage areas and all haulage areas; and to clearly show on a map all of the preceding in accordance with R645-301-500.

Underground development waste will be backfilled into dead-end panels in the mine. Due to the extensive water intercepted in the mine the mine will need to consider further testing and column leach analyses of underground coal mine waste. This information will not be requested as part of this Division Order since the permittee is not currently mining and the issue can be addressed during processing of the federal lease area permitting action. Snow storage locations are shown within the disturbed area designed to report to the sedimentation pond. This location satisfies the requested information for snow storage in the division order.

ITEM 1b. Update the text and maps to show the reclamation plans for each of the preceding items if different than the current reclamation plan, or if the current plan does not include the preceding items in 1.a. in accordance with R645-301-500.

The changes to the reclamation plan in this amendment are not directly related to surface configuration changes due to storage of coal waste. The changes presented in relation to sediment pond removal and interim sediment control measures are not adequate to meet the best management practices/alternate sediment control measures. Since this is not related to this Division order it is recommended the information be submitted in conjunction with permitting the new lease area. Additional detail describing the reclamation sequence and proposed construction activity are necessary before approval can be granted for the proposed alternate sediment control measures. The use of silt fences in the stream channel is not an acceptable ASC/BTCA measure for this site.

Findings:

The applicant did not meet all applicable requirements of the R645 regulations in the submitted amendment. The applicant must provide the following prior to approval:

R645-301-730. Additional detail describing the reclamation sequence specific to the disturbed area, the proposed construction activity and maintenance, are necessary before approval can be granted for the proposed alternate sediment control measures.

RECOMMENDATION:

It is recommended the Division engineer review information regarding bonding, mine panel information, newly proposed portal entries and changes from the original permit approval. It is recommended the applicant be given the opportunity to remove unrelated permitting changes rather than to try and meet the regulatory requirements for changes that are unrelated to the coal waste storage issues of this Division Order.